

BINDER &
SCHWARTZ

Eric B. Fisher
Binder & Schwartz LLP
366 Madison Avenue 6th Floor
New York, NY 10017

(T) 212.933.4551
(F) 212.510.7299
efisher@binderschwartz.com

June 16, 2023

By ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1305
New York, New York 10007

Re: *Carlyle Aviation Management Limited, et al. v. Frontier Airlines, Inc.*,
No. 1:23-cv-04774 (PAE) – Request for Extension of Time to Respond to Complaint

Dear Judge Engelmayer:

We represent Frontier Airlines, Inc. (“Frontier”) in the above-captioned proceedings and write to respectfully request an extension of time to respond to the Complaint.

Frontier was served with the Summons and Complaint on June 5, 2023. On June 6, 2023, Frontier removed the action to this Court and on June 8, 2023, this Court accepted the case as related to the action captioned *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Limited, et al.*, Case No. 22-cv-02943 (PAE).

Pursuant to the letter from Jed M. Schwartz, dated June 14, 2023 and filed in the related action, the parties have agreed to attend a mediation on June 28, 2023, in an effort to resolve Frontier’s Application to Convert Temporary Restraining Order to Preliminary Injunction filed in the related action, as well as the entirety of the parties’ dispute, including this action.

Pursuant to Fed. R. Civ. P. 81(c)(2), Frontier’s deadline to respond to the Complaint is June 26, 2023. Frontier respectfully requests an extension of its time to respond to the Complaint to July 26, 2023. This is Frontier’s first request for an extension of time to respond to the Complaint. Counsel for Plaintiffs consent to this request.

Respectfully submitted,

/s/ Eric B. Fisher
Eric B. Fisher

cc: Jed M. Schwartz, Esq. (via email)
Emily Werkmann, Esq. (via email)

Granted. SO ORDERED.

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge

June 16, 2023